## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

MEDIEN PATENT VERWALTUNG AG,

Plaintiff,

Civil Action No. 1:10-cv-04119-CM

v.

**ECF Case** 

WARNER BROS. ENTERTAINMENT INC., TECHNICOLOR INC. and DELUXE ENTERTAINMENT SERVICES GROUP INC.,

JURY TRIAL DEMANDED

Defendants.

## DECLARATION OF SEAN E. JACKSON, ESQ. IN SUPPORT OF THE OPENING CLAIM CONSTRUCTION BRIEF OF PLAINTIFF MEDIEN PATENT VERWALTUNG AG

## I, Sean E. Jackson, declare as follows:

- 1. I am an attorney in good standing admitted to the bar of the States of New York and Connecticut and am associated with the law firm of Crowell & Moring, LLP. I submit this declaration in support of the Opening Claim Construction Brief of Plaintiff Medien Patent Verwaltung AG.
- 2. Attached hereto as **Exhibit A** is a true and correct copy of the document entitled "The Cost of Movie Piracy," prepared by L.E.K. Consulting for the Motion Picture Association.
- 3. Attached hereto as **Exhibit B** is a true and correct copy of the USA Today® article entitled "Movie Industry Steps Up Piracy Battle," dated March 13, 2008 and authored by Scott Bowles, available at http://www.usatoday.com/life/movies/news/2008-03-11-showest-piracy\_N.htm.
- 4. Attached hereto as **Exhibit C** is a true and correct copy of United States Patent No. 7,187,633.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 27, 2011

Sean E. Jackson

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 27, 2011, a true and correct copy of the foregoing DECLARATION OF SEAN E. JACKSON, ESQ. IN SUPPORT OF THE OPENING CLAIM CONSTRUCTION BRIEF OF PLAINTIFF MEDIEN PATENT VERWALTUNG AG and attached EXHIBITS A, B, and C were served to all counsel of record via the Court's CM/ECF system and via electronic mail as follows:

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